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April 3, 2006

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Mary Cottrell, Secretary

By Overnight Mail

Massachusetts Department of Telecommunications and Energy

Re: Docket 04-87; Complaint of CTC Communications Corp.

One South Station

Boston, MA 02110

bingham.com

Dear Ms. Cottrell:

Boston Hartford

London

Los Angeles

New York

Orange County

San Francisco

Silicon Valley

Tokyo

Walnut Creek

Washington

CTC Communications Corp. ("CTC") herewith files an original and eight (8) copies of its Motion for Extension of Time. A diskette containing an electronic copy of this document in Microsoft Word is enclosed.

Please date-stamp the enclosed extra copy of this filing and return it in the attached self-addressed, postage pre-paid envelope provided.

Respectfully submitted,

Eduar W. Kinh

Russell M. Blau

Edward W. Kirsch

cc: Jesse Reyes, Esq.

Paula Foley, Assistant General Counsel

Michael Isenburg, Director—Telecommunications Division

Bruce Beausejour, Esq.

Alexander Moore, Esq.

## COMMONWEALTH OF MASSACHUSETTS DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

COMPLAINT OF CTC COMMUNICATION	NS )	
CORP. CONCERNING REFUSAL	)	
BY VERIZON MASSACHUSETTS TO	)	<b>DTE No. 04-87</b>
PROVIDE UNBUNDLED NETWORK	)	
ELEMENTS AT TARIFFED RATES	j	

## **MOTION FOR EXTENSION OF TIME**

CTC Communications Corp. ("CTC") hereby moves the Department for an extension of time, pursuant to 220 CMR § 1.02(5), to respond to the brief of Verizon New England Inc., d/b/a Verizon Massachusetts' ("Verizon") in support of default rates for carriers, Verizon's motion for reconsideration, and Verizon's motion for relief from tariffing requirement, which are all dated March 29, 2006. CTC specifically requests a two-week extension until April 26, 2006 to file its reply brief and motion responses.

In its Order on Motion for Reconsideration dated March 9, 2006 ("Order"), the Department directed CTC to file a response brief within 14 days of Verizon's filing. On March 29, 2006, the same day that Verizon filed a brief in accordance with the Order, Verizon also filed two motions requesting reconsideration of the Order and requesting relief from tariffing as required by the Order. Given that Verizon's brief incorporates references to the two additional motions, CTC requests that it be given additional time to fully respond to all three pleadings in a coordinated manner. A two-week extension of time to respond to all three pleadings is a reasonable request that is in the interest of efficiency and economy.

Accordingly, CTC respectfully requests that the Department grant its motion for an extension of time and allow CTC to concurrently file its reply brief, a response to Verizon's motion for reconsideration, and a response to Verizon's motion for relief on April 26, 2006.

Respectfully submitted,

Russell M. Blau Edward W. Kirsch

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Counsels for Complainant

Date: April 3, 2006

## **CERTIFICATE OF SERVICE**

I hereby certify that on April 3, 2006, I caused a copy of the foregoing CTC Motion for Extension of Time to be served by overnight mail to the following:

Bruce P. Beausejour Alexander W. Moore 185 Franklin Street, 13<sup>th</sup> Floor Boston, MA 02110-1585

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